

Exhibit 8

From: adrienne.scheffey@akerman.com
To: [Whitehead, Jamal](#); ashley.calhoun@akerman.com
Cc: colin.barnacle@akerman.com
Subject: RE: Nwauzor v. GEO - Amended Notice Plan
Date: Monday, December 2, 2019 7:45:21 AM
Attachments: [image001.png](#)
[Nwauzor class notice data pull.xlsx](#)

EXTERNAL
EMAIL

Hi Jamal,

Please find attached the information from ICE with updated detention information, as requested. Given this information, we think that any outstanding concerns about the class list have been resolved. As you know, the rest of the information was previously provided from ICE's records.

To that end, we do not think there is a reason to forego mailed notice to the putative class members as ordered by the Court. As the goal is to reach as many impacted individuals as possible, mailed notice will help accomplish this goal. This is true even if some of the addresses are now outdated or unreliable. Certainly, Plaintiffs were aware when they sought to certify a class that there would be some expense associated with notifying individuals who have been released from ICE custody. Additionally, on our call you had mentioned that the *Menocal* Court procedures were analogous to those here. As you know, the *Menocal* Court ordered mailed notice.

Please let us know if you would like to further discuss the notice process or if you plan to file your motion as opposed.

Best,

Adrienne Scheffey

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Profile



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From: Whitehead, Jamal <whitehead@sgb-law.com>
Sent: Monday, December 2, 2019 7:30 AM

To: Scheffey, Adrienne (Assoc-Den) <adrienne.scheffey@akerman.com>; Calhoun, Ashley (Assoc-Den) <ashley.calhoun@akerman.com>

Subject: RE: Nwauzor v. GEO - Amended Notice Plan

Please send me our redline of the proposed revisions to the notice plan today or let me know if we should jump on a call to discuss this further. I expect to take a lunch break during today's deposition sometime between noon and 1:00 p.m. if you'd like to talk. -JW

Jamal N. Whitehead

Schroeter Goldmark & Bender

206.622.8000 | whitehead@sgb-law.com

From: Whitehead, Jamal

Sent: Monday, November 25, 2019 11:17 AM

To: adrienne.scheffey@akerman.com; Ashley Calhoun <ashley.calhoun@akerman.com>

Subject: RE: Nwauzor v. GEO - Amended Notice Plan

Adriene, Ashley, do you have an update for me re: the proposed revision to the notice plan? -JW

Jamal N. Whitehead

Schroeter Goldmark & Bender

206.622.8000 | whitehead@sgb-law.com

From: Whitehead, Jamal

Sent: Monday, November 18, 2019 3:30 PM

To: Ashley Calhoun <ashley.calhoun@akerman.com>; Colin Barnacle <colin.barnacle@akerman.com>; melissa.cizmorris@akerman.com; Adrienne Scheffey <adrienne.scheffey@akerman.com>

Cc: Ill Branches Law <joan@3brancheslaw.com>; joe@3brancheslaw.com; Kristi Rigsby <kristi@3brancheslaw.com>; Andrew Free <andrew@immigrantcivilrights.com>; Berger, Adam <berger@sgb-law.com>; Cronan, Sheila <cronan@sgb-law.com>; Devin Theriot-Orr <devin@opensky.law>; Halm, Lindsay <halm@sgb-law.com>; Meena Menter <meena@meenamenter.com>; Mendoza, Virginia <mendoza@sgb-law.com>; Roe, Becky <roe@sgb-law.com>

Subject: Nwauzor v. GEO - Amended Notice Plan

Ashley,

This follows our conversation from a few weeks ago about the state of the class list, among other things, and the need to amend the initial notice plan in light of all the duplicate and/or missing addresses. Attached is a motion we plan to file with the Court seeking to amend the notice plan. I'd like to discuss the motion with you some time soon.

I'm generally available tomorrow to discuss.

Best,
Jamal



Jamal N. Whitehead

Attorney

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